

### **REMARKS**

Applicants respectfully request reconsideration and allowance in view of the foregoing amendment and the following remarks. Applicants amend claim 1 without prejudice or disclaimer.

#### **Rejection of Claims 1-8 and 10-28 Under 35 U.S.C. §103(a)**

The Office Action rejects claims 1-8 and 10-28 under 35 U.S.C. §103(a) as being unpatentable over Sezan et al. (U.S. Patent No. 6,236,395) ("Sezan et al.") in view of Chen et al. (U.S. Patent No. 6,307,550) ("Chen et al."), Jain et al (U.S. Patent No. 6,144,375) ("Jain et al.") and further in view of Slezak (U.S. Patent No. 6,006,257) ("Slezak"). Applicants amend claim 1 to recite an additional limitations of a plurality of images that includes viewer-specific image data and further that the virtual camera scripts specify a variable assigned to one piece of the viewer-specific image data.

The specification provides support for this new limitation at page 15, line 30 – page 16, line 8. Some non-limiting examples from the specification of viewer-specific image data are a household member such as a child's face, local merchants, local points of interest, and local professionals such as a realtor providing a tour of a house. Image data can be viewer-specific in that it closely relates to the viewer and is familiar or recognizable to the viewer.

Applicants submit that the proposed combination of references, specifically Sezan et al., does not teach or suggest these new limitations for at least two reasons. First, Sezan et al. do not teach that the received multimedia data input includes viewer-specific image data. Sezan et al. describe a program 38 shown in FIG. 2 as originating for example from broadcast television, cable television, satellite television, digital television, Internet broadcasts, world wide web, and digital video discs. Sezan et al., col. 7, lines 50-67. These media sources do not provide viewer-

specific data as recited in claim 1. On the contrary, these sources provide mass media content which is the same for all viewers and does not provide different multimedia content for specific viewers.

Further, Sezan et al. teach a user description scheme that provides information regarding the user's preferences. Sezan et al., Abstract. Such a user description scheme, while providing potentially useful information regarding users, does not teach or suggest viewer-specific image data. The system of Sezan et al. compares information in the user description scheme and in the program description scheme in order to make selections. The user description scheme indicates user preferences for mass media described in the program description scheme and does not teach viewer-specific image data.

Second, Sezan et al. do not teach that the virtual camera scripts specify a variable assigned to one piece of the viewer-specific image data. Sezan et al. teach a program description scheme and character profiles which can identify particular image objects in multimedia data, such as Michael Jordan. Sezan et al., col. 5, lines 10-32. Sezan et al. further teach that a character profile can include position and size of the region of the object, movement of the region between frames, text and audio annotations, and even web page information. However, none of these pieces of information teach or suggest a variable assigned to one piece of viewer-specific image data. These pieces of information are not viewer-specific because they are each the same for every viewer. The information included in the program description scheme of Sezan et al. is directed solely to the content of the media and does not take in to account the relationship of the media content to a viewer in such a way as to acknowledge that certain image data is or is not viewer-specific. Therefore, Sezan et al. do not teach any way to associate a variable with viewer-specific image data. Applicants submit that the proposed combination of references does not teach or suggest all the limitations of claim 1. Applicants further submit that

claims 2-8 and 10-28 are patentable inasmuch as they depend from claim 1 and recite additional limitations therefrom. Accordingly, Applicants respectfully request that the 35 U.S.C. §103(a) rejection be withdrawn.

**CONCLUSION**

Having addressed all rejections and objections, Applicants respectfully submit that the subject application is in condition for allowance and a Notice to that effect is earnestly solicited. If necessary, the Commissioner for Patents is authorized to charge or credit the **Novak, Druce & Quigg, LLP, Account No. 14-1437** for any deficiency or overpayment.

Respectfully submitted,

Date: March 30, 2009

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